

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-726 (JJF)
)	Civil Action No. 07-357 (JJF)
CHI MEI OPTOELECTRONICS)	
CORPORATION, et al.)	CONSOLIDATED CASES
)	
Defendants.)	
)	

**DEFENDANT CHI MEI OPTOELECTRONICS CORPORATION'S
MOTION TO CONSOLIDATE AND TO EXTEND DISCOVERY LIMITS**

Chi Mei Optoelectronics Corporation ("CMO") moves the Court, in accordance with Rule 42(a) of the Federal Rules of Civil Procedure provides, to consolidate the above-captioned action with the case recently transferred from the Eastern District of Texas, *Chi Mei Optoelectronics Corporation v. LG Philips LCD Co., Ltd., and LG Philips LCD America, Inc*, Civil Action No. 08-355-JJF. To accommodate the consolidation, CMO further moves the Court to amend the April 29, 2008 Scheduling Order as follows: (1) completion of fact discovery by February 17, 2009; (2) each party to depose non-parties for a maximum of 60 hours; and (3) any motions to amend pleadings to be filed on or before October 31, 2008. CMO's proposed amendments do not require any additional changes to the Scheduling Order, and this case would remain on course for trial on June 2, 2009. CMO's motion is based on the accompanying Opening Brief in Support of Chi Mei Optoelectronics Corporation's Motion to Consolidate and to Extend Discovery Limits, and upon the papers, records and pleadings on file with the Court in this case.

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Dated: June 25, 2008
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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on June 25, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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I hereby certify that on June 25, 2008 I have sent by E-mail the foregoing document to the following non-registered participants:

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**NOTICE OF MOTION FOR TO CONSOLIDATE AND TO
EXTEND DISCOVERY LIMITS**

PLEASE TAKE NOTICE that, Defendant Chi Mei Optoelectronics Corporation will present Chi Mei Optoelectronics Corporation's Motion To Consolidate And To Extend Discovery Limits to the Court on Friday, September 12, 2008 at 10:00 a.m. or on any other date ordered by the Court.

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ORDER

AND NOW, the Court, this _____ day of _____, upon consideration of Defendant Chi Mei Optoelectronics Corporation's Motion for Consolidation and Extension of Discovery Limits, Plaintiff LG Display Co., Ltd.'s Opposition thereto, and related materials, does hereby **ORDER**:

1. *Chi Mei Optoelectronics Corporation v. LG Philips LCD Co., Ltd., and LG Philips LCD America, Inc*, Civil Action No. 08-355-JJF is consolidated with the above-captioned case.

2. The Rule 16 Scheduling Order in this case is amended as follows:

Paragraph 4.(f): Each party may depose non-parties for a maximum of 60 hours.

Paragraph 4.(g): Fact discovery shall be completed by February 17, 2009. Parties may serve document requests and interrogatories on each other so as to be completed by this date.

Paragraph 6: All motions to amend the pleadings shall be filed on or before October 31, 2008.

IT IS SO ORDERED:

The Honorable Joseph J. Farnan, Jr.

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**CHI MEI OPTOELECTRONICS CORPORATION'S CERTIFICATION OF
COUNSEL PURSUANT TO LOCAL RULES 7.1.1 AND 16.4 REGARDING
MOTION TO CONSOLIDATE AND TO EXTEND DISCOVERY LIMITS**

Pursuant to Local Rule 7.1.1, I hereby certify that counsel for Chi Mei Optoelectronics Corporation ("CMO") has attempted in good faith to resolve the issues presented in CMO's June 25, 2008 Motion to Consolidate and Extend Discovery Limits. Counsel for CMO and LG Display Co., Ltd. have exchanged numerous e-mails and communicated by telephone in an attempt to resolve the issues. Pursuant to Local Rule 16.4, I hereby certify that Counsel for CMO has sent a copy of the requested relief to its client.

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Dated: June 25, 2008

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